

1 STEPHANIE M. HINDS (CABN 154284)
United States Attorney

2 TOM COLTHURST (CABN 99493)
3 Chief, Criminal Division

4 COLIN C. SAMPSON (CABN 249784)
450 Golden Gate Avenue, Box 36055
5 San Francisco, California 94102-3495
6 Tel: (415) 436-7200
Fax: (415) 436-7234
Colin.Sampson@usdoj.gov

7 MATTHEW J. MCKENZIE (NY 4791513)
8 Trial Attorney, National Security Division
9 950 Pennsylvania Ave., NW
Washington, DC 20530
10 Tel: (202) 514-7845
Fax: (202) 233-2146
Matthew.Mckenzie@usdoj.gov

12 Attorneys for United States of America

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 OAKLAND DIVISION

16 UNITED STATES OF AMERICA,

17 Plaintiff,

18 v.

19 PANGANG GROUP COMPANY, LTD.;
PANGANG GROUP STEEL VANADIUM &
20 TITANIUM COMPANY, LTD.; PANGANG
GROUP TITANIUM INDUSTRY COMPANY,
21 LTD; and PANGANG GROUP
INTERNATIONAL ECONOMIC &
22 TRADING COMPANY, LTD.,

23 Defendants.

) CASE NO. CR 11-0573-JSW

) UNITED STATES' OPPOSITION TO THE
PANGANG DEFENDANTS' SECOND MOTION
TO DISMISS AND PARTIAL MOTION TO
STRIKE [DKT 1295]: SUPPLEMENTAL
AUTHORITIES

) Date: January 14, 2022
Time: 9:00 AM
Location: Courtroom 5, 2nd Floor

The United States, by and through its undersigned attorney's, submits the following supplemental authorities pursuant to the Court's Order, dated January 12, 2022:

- *Petty v. Tennessee-Missouri Bridge Commission*, 359 U.S. 275, 276 (1956).
 - *Clark v. Barnard*, 108 U.S. 436, 447 (1883).
 - *The Sao Vicente*, 295 F. 829, 831 (3d. Cir. 1924).
 - *Kunglig Jarnvagsstyrelsen v. Dexter & Carpenter*, 300 F. 891, 892-93 (S.D.N.Y. 1924) (J. Learned Hand).
 - H . Rep. No. 1487, 94th Cong.2d Sess. 18, reprinted in 1976, U.S.C.C.A.N. 6604, 6617.

Dated: January 13, 2021.

Respectfully submitted,

STEPHANIE M. HINDS
United States Attorney

/s/ Colin Sampson
COLIN C. SAMPSON
Assistant United States Attorney
MATTHEW J. MCKENZIE
Trial Attorney, National Security Division

SUPPLEMENTAL AUTHORITIES,
CR 11-0573 JSW